

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
City of Lubbock

AUTHORIZING THE OPERATION OF
Texas Tech Cogeneration Facility
Electric Services

LOCATED AT
Lubbock County, Texas
Latitude 33° 34' 59" Longitude 101° 53' 6"
Regulated Entity Number: RN100223692

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O546 Issuance Date: _____

For the Commission

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):

- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
 - B. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
 - C. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (ii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)

- (iii) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)

- 4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
 - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)
 - G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)

Additional Monitoring Requirements

- 5. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached “CAM Summary” upon issuance of the permit. In addition, the permit holder shall comply with the following:
 - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
 - B. The permit holder shall report, consistent with the averaging time identified in the “CAM Summary,” deviations as defined by the deviation limit in the “CAM Summary.” Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified in the “CAM Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
 - D. The permit holder shall operate the monitoring, identified in the attached “CAM Summary,” in accordance with the provisions of 40 CFR § 64.7.
 - E. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to detect leaking components for any capture system associated with the control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions.

- F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.
6. The permit holder shall comply with the periodic monitoring requirements as specified in the attached "Periodic Monitoring Summary" upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified in the "Periodic Monitoring Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

New Source Review Authorization Requirements

7. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
- A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
8. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
9. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

Compliance Requirements

10. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.

11. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Protection of Stratospheric Ozone

12. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
- A. The permit holder shall comply with 40 CFR Part 82, Subpart H related to Halon Emissions Reduction requirements as specified in 40 CFR § 82.250 - § 82.270 and the applicable Part 82 Appendices.

Alternative Requirements

13. The permit holder shall comply with the approved alternative means of control (AMOC); alternative monitoring, recordkeeping, or reporting requirements; or requirements determined to be equivalent to an otherwise applicable requirement contained in the Alternative Requirements attachment of this permit. Units complying with an approved alternative requirement have reference to the approval in the Applicable Requirements summary listing for the unit. The permit holder shall maintain the original documentation, from the EPA Administrator, demonstrating the method or limitation utilized. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.

Permit Location

14. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit at the City of Lubbock Business Center, 1301 Broadway, Lubbock, TX, 79401.

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

New Source Review Authorization References

Alternative Requirement

Applicable Requirements Summary

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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
TURB-1	Stationary Turbines	N/A	60GG-1	40 CFR Part 60, Subpart GG	No changing attributes.
TURB-1 STACK	Emission Points/ Stationary Vents/ Process Vents	N/A	111A-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
TURB-1	EU	60GG-1	SO ₂	40 CFR Part 60, Subpart GG	§ 60.333(b)	No stationary gas turbine shall burn any fuel which contains sulfur in excess of 0.8% by weight.	§ 60.334(h) § 60.334(h)(4) ** See Alternative Requirement	None	None
TURB-1	EU	60GG-1	NO _x	40 CFR Part 60, Subpart GG	§ 60.332(a)(1) § 60.332(a)(3) § 60.332(f) § 60.332(i)	No owner or operator shall discharge into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of the amount as determined from the specified equation.	§ 60.334(a) § 60.334(g) § 60.334(j) § 60.334(j)(1) [G]§ 60.334(j)(1)(i) [G]§ 60.335(a) § 60.335(b)(1) § 60.335(b)(2) § 60.335(b)(4) § 60.335(c)(1) ** See CAM Summary	§ 60.334(a) § 60.334(g)	§ 60.334(j) § 60.334(j)(3) § 60.334(j)(5)
TURB-1 STACK	EP	111A-1	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(C) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 15% averaged over a six minute period for any source with a total flow rate of at least 100,000 acfm unless a CEMS is installed.	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring Summary	None	None

Additional Monitoring Requirements

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CAM Summary

Unit/Group/Process Information	
ID No.: TURB-1	
Control Device ID No.: SWIS	Control Device Type: Steam/Water Injection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO _x	Main Standard: § 60.332(a)(1)
Monitoring Information	
Indicator: Steam or Water Flow Rate	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: A minimum water/steam to fuel consumption ratio shall be determined per the plot of steam injection rate versus turbine fuel rate, as stated from the most recent performance test data dated 01/23/1997.	
CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within $\pm 5\%$.	

CAM Summary

Unit/Group/Process Information	
ID No.: TURB-1	
Control Device ID No.: SWIS	Control Device Type: Steam/Water Injection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart GG	SOP Index No.: 60GG-1
Pollutant: NO _x	Main Standard: § 60.332(a)(1)
Monitoring Information	
Indicator: Fuel Consumption	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: Maximum fuel consumption limit shall not exceed 9,985 lbs/hr.	
<p>CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the fuel flow meter is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within $\pm 5\%$.</p>	

Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: TURB-1 STACK	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: 111A-1
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Fuel Type	
Minimum Frequency: Annually or at any time an alternate fuel is used	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder shall either report a deviation or perform Test Method 9 and opacity shall not exceed 15%.	
<p>Periodic Monitoring Text: Record the type of fuel used by the unit. If an alternate fuel is fired, either alone or in combination with the specified gas, for a period greater than or equal to 24 consecutive hours it shall be considered and reported as a deviation or the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are observed. Any time an alternate fuel is fired for a period of greater than 7 consecutive days then visible emissions observations will be conducted no less than once per week. Documentation of all observations shall be maintained. If visible emissions are present during the firing of an alternate fuel, the permit holder shall either list this occurrence as a deviation or the permit holder may determine the opacity consistent with Test Method 9. Any opacity readings that are above the opacity limit from the underlying applicable requirement shall be reported as a deviation.</p>	

New Source Review Authorization References

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New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 18846	Issuance Date: 03/03/2014
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.355	Version No./Date: 03/14/1997
Number: 106.472	Version No./Date: 03/14/1997
Number: 106.473	Version No./Date: 03/14/1997
Number: 3	Version No./Date: 09/12/1989
Number: 4	Version No./Date: 09/12/1989
Number: 5	Version No./Date: 05/12/1981
Number: 12	Version No./Date: 09/12/1989
Number: 34	Version No./Date: 09/12/1989
Number: 38	Version No./Date: 09/12/1989
Number: 44	Version No./Date: 09/23/1982
Number: 49	Version No./Date: 09/12/1989
Number: 69	Version No./Date: 04/04/1975
Number: 70	Version No./Date: 09/12/1989

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
TURB-1 STACK	TURBINE STACK	18846
TURB-1	GENERAL ELECTRIC LM2500 GAS TURBINE	18846

Alternative Requirement

Alternative Requirement..... 19



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

LUBBOCK POWER & LIGHT

RECEIVED

APR 17 1998

APR 15 1998

Mr. Jay Wadsworth
Production Superintendent
Lubbock Power and Light
P.O. Box 2000
Lubbock, TX 79457

Dear Mr. Wadsworth:

Pursuant to 40 CFR § 60.334 (b)(2), the Environmental Protection Agency (EPA) has completed its review of your request dated August 13, 1997, along with the additional data supplied for a Custom Fuel Monitoring Schedule (CFMS) for the turbine at City of Lubbock/Lubbock Power and Light's Texas Tech Cogeneration Facility located in Lubbock, Lubbock County, Texas. Your request for a CFMS is approved and is effective on the date of this letter. Therefore, you may begin the CFMS with the Phase I Bi-weekly sampling frequency. Please note that the "length of stain tube" test method for sulfur has been added to the CFMS as an alternative testing option, providing that the Gas Processors Association Standard 2377-86 is followed.

After the completion of each phase of the CFMS, please send EPA and the Texas Natural Resource Conservation Commission (TNRCC) a copy of your laboratory fuel sulfur content test results to ensure compliance with the terms of the CFMS and New Source Performance Standards (NSPS) Subpart GG (i.e., Phase I, 6 months; Phase II, 18 Months; Phase III, 2 Years).

If you have any questions or need additional information, please contact Peter Goerdel at (214) 665-7294 or Ed Guice at (214) 665-7554.

Sincerely yours,

John R. Hepola
Chief
Air/Toxics and Inspection
Coordination Branch

Enclosure

ENCLOSURE I

CFMS for the City of Lubbock/Lubbock Power and Light's Texas Tech Cogeneration Facility located in Lubbock, Lubbock County, Texas.

The following CFMS is approved as an alternative to the monitoring requirements contained in § 60.334 (b) (2).

1. Nitrogen Monitoring

- a. Monitoring of fuel nitrogen content shall not be required while pipeline-quality natural gas is the only fuel fired in the gas turbine.
- b. Monitoring of fuel nitrogen content shall be determined and recorded daily while firing a fuel other than pipeline-quality natural gas or while firing an emergency fuel as defined in 40 CFR § 60.331 (r).
- c. Should a nitrogen analysis, required for any reason other than firing an emergency fuel, demonstrate noncompliance with 40 CFR § 60.332, then the owner or operator shall immediately notify the Texas Natural Resource Conservation Commission (TNRCC) and Environmental Protection Agency (EPA) of the excess emissions, and the CFMS shall be re-examined by TNRCC and EPA. Nitrogen monitoring shall be conducted daily during the interim period when this CFMS is being re-examined.
- d. If there is a change in fuel supply, the owner or operator must immediately notify TNRCC and EPA of such change for re-examination of this CFMS. A change in fuel quality, fuel makeup or fuel supplier shall be considered as a change in fuel supply. Nitrogen monitoring shall be conducted daily during the interim period when this CFMS is being re-examined.

2. Sulfur Monitoring

- a. Analysis for fuel Sulfur content of the gas turbine fuel (natural gas or any other type of fuel) shall be conducted using the appropriate methods specified in 40 CFR § 60.335 (d).
- b. The "length of stain tube" method is approved as an alternative fuel Sulfur test method for this CFMS, providing that the Gas Processors Association (GPA) procedures are followed and 100% pipeline-quality natural gas is the only fuel fired in the gas turbines. (GPA Standard 2377-86)

- c. Monitoring of fuel Sulfur content shall be determined and recorded daily while firing an emergency fuel as defined in 40 CFR § 60.331 (r). Effective the date of this CFMS, the sampling and analysis frequency for fuel sulfur allowed under this CFMS fuel schedule is as follows:

<u>PHASE</u>	<u>FREQUENCY</u>	<u>PERIOD</u>
I	Biweekly ¹	Six Months
II	Quarterly	Eighteen Months
III	Semiannually	Two Years ²

If, during the period of each phase, this monitoring shows little variability in the fuel sulfur content and demonstrates continuous compliance with the emission limits for Sulfur Dioxide contained in 40 CFR § 60.333, the company may then proceed to the next sampling phase and provide the test results for the previous phase with written notice to TNRCC and EPA.

- d. Should a sulfur analysis, required for any reason other than for firing emergency fuel, demonstrate non-compliance with the emission limits for Sulfur Dioxide contained in 40 CFR § 60.333, the owner or operator shall immediately notify TNRCC and EPA of such excess emissions and sulfur monitoring shall be conducted daily during the interim period while this CFMS is being re-examined.
- e. If there is a change in fuel supply, the owner or operator must notify TNRCC and EPA of such change for re-examination of this CFMS. A change in fuel quality, fuel makeup or fuel supplier shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted daily during the interim period when this CFMS is being re-examined.

3. General

- a. Approval of this CFMS is based on the application submitted by the company, dated August 13, 1997, and additional information supplied March 6, 1998, for the firing of 100% pipeline-quality natural gas. Any

¹ Biweekly means twice every other week.

² This monitoring shall be conducted during the first and third quarters of each calendar year.

change in any representation made by the company in this application shall cause this CFMS to be suspended and re-examined by TNRCC or EPA. TNRCC and EPA shall be notified immediately if any such change occurs.

- b. All analyses required by this custom schedule shall be performed by a laboratory using the approved test methods.
- c. The company may request that EPA allow for the substitution of any analytical method for another method specified in this CFMS. Any substitution will require the written approval of EPA.
- d. TNRCC and EPA may request that an audit of the fuel sampling program be conducted at any time during the life of this custom schedule. This audit shall consist of daily sampling of the fuel gas for either nitrogen content, sulfur content, or both. The length of this audit shall be no less than two weeks. If non-compliance values are found, paragraphs 1(c) and/or 2(d) shall govern.
- e. Records of sample analysis, fuel supplier, fuel supply, fuel quality, and fuel make-up pertinent to this custom schedule shall be retained for a period of two years, and be made available for inspection by personnel of federal, state, and local air pollution control agencies.
- f. After the initial four year term of the CFMS, the custom schedule will continue using the same monitoring, recordkeeping and notification requirements as stipulated in Phase III of the schedule. However, TNRCC OR EPA can choose to terminate the CFMS and require the company to reapply for a CFMS. Termination of the CFMS will require that the company begin sampling as required by 40 CFR §60.334.
- g. Date of issuance _____.

Appendix A

Acronym List 24

Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound